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Subject: Portland Harbor FS check-in comment
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Chip & Kristine –

I did not stay for the end of the full FS meeting on June 21, and I missed most of the agency follow-up meeting on June 28. However, I do have one comment that I want to pass along.

I acknowledge that I do not fully understand the use of the RAL approach, but I am concerned about exactly how they intend to show compliance with background levels. The most important chemicals for human exposure are PCBs. Following EPA's draft list of PRGs, the LWG is presenting the upstream PCB sediment level as 17 ug/kg. I am not entirely sure what this value represents. From Table 7.3-5b of the draft RI report, it appears to be the 95 percent upper prediction limit for total PCBs as congeners and Aroclors. It is not the mean background concentration. My concern is that it will be used as a mean value in evaluating sediment cleanup effectiveness. The mean upriver PCB concentration appears to be in the 5 ug/kg to 7 ug/kg range.

Before this issue becomes a comment to the LWG, I would like to understand how EPA intends to apply the PCB background PRG of 17 ug/kg. I think the initial intent may have been to use it as a hilltopping value. Also, note that in Table 7.3-5b, the EPA value for the 95 UPL is 11 ug/kg. Feel free to call me if you have questions or want to discuss this further. Thanks.

- Mike